

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

ANACONDA, INC.

Plaintiff,

v.

DELL, INC.

Defendant.

Civil Action No. 1:24-cv-1527

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Anaconda, Inc. and Defendant Dell, Inc. hereby notify the Court that the parties have reached an agreement in principle in this matter that settles all matters in controversy between the parties. The parties request that the Court stay this case for forty-five (45) days and toll the running of any existing deadlines, so that the parties may finalize the settlement agreement and submit appropriate dismissal papers.

The parties request this stay, not for the purpose of delay, but so that they may satisfy the terms of the settlement agreement and file dismissal papers without incurring additional expenses.

A proposed Order is attached for the Court's convenience.

Dated: February 4, 2025.

Respectfully submitted,

/s/ Karl Rupp  
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COUNSEL FOR DEFENDANT

**CERTIFICATE OF CONFERENCE**

On February 4, 2025 Karl Rupp, Counsel for Plaintiff and Emily Fitzgerald, Counsel for Defendant, conferred regarding entry of this Joint Motion to Stay All Deadlines and Notice of Settlement and both have agreed to the filing of this document.

/s/ *Karl Rupp*  
Karl Rupp

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been delivered to all counsel of record via email on this 4th of February, 2025.

/s/ *Karl Rupp*  
Karl Rupp